

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

**SECURITIES INVESTOR PROTECTION  
CORPORATION,**

Plaintiff-Applicant,

v.

**BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,**

Defendant.

---

In re:

**BERNARD L. MADOFF,**

Debtor.

**IRVING H. PICARD, Trustee for the Liquidation  
of Bernard L. Madoff Investment Securities LLC,**

Plaintiff,

v.

**ABN AMRO FUND SERVICES (ISLE OF MAN)  
NOMINEES LIMITED, f/k/a Fortis (Isle Of Man)  
Nominees Limited, PLATINUM ALL WEATHER  
FUND LIMITED, and ODYSSEY,**

Defendants.

Adv. Pro. No. 08-01789 (SMB)

**SIPA LIQUIDATION**

(Substantively Consolidated)

Adv. Pro. No. 12-01697 (SMB)

**STIPULATION EXTENDING TIME TO RESPOND  
AND ADJOURNING THE PRE-TRIAL CONFERENCE**

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the time by which defendant Platinum All Weather Fund Limited (“Defendant”) may answer, move against, or otherwise respond to the Trustee’s complaint (“Complaint”) is extended up to and including November 21, 2014. The pre-trial conference will be adjourned from December 17, 2014, at 10:00 a.m. to January 28, 2015, at 10:00 a.m.

The purpose of this stipulated extension (“Stipulation”) is to provide additional time for the Defendant to answer, move against, or otherwise respond to the Complaint. Nothing in this

Stipulation is a waiver of the Defendant's right to request from the Court a further extension of time to answer, move against, or otherwise respond to the Complaint and/or the Trustee's right to object to any such request.

The parties to this Stipulation reserve all other rights and defenses they may have, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photocopy, or electronic copy of this Stipulation shall be deemed an original. This Stipulation is entered into pursuant to the Order Granting Supplemental Authority to Stipulate to Extensions of Time to Respond and Adjourn Pre-Trial Conferences (Adv. Pro. No. 08-01789 (SMB), Dkt. No. 7037).

Dated: October 8, 2014  
New York, New York

**BAKER & HOSTETLER LLP**

By: /s/ Thomas L. Long  
45 Rockefeller Plaza  
New York, New York 10111  
Telephone: (212) 589-4200  
Facsimile: (212) 589-4201  
David J. Sheehan  
Email: dsheehan@bakerlaw.com  
Thomas L. Long  
Email: tlong@bakerlaw.com  
Mark A. Kornfeld  
Email: mkornfeld@bakerlaw.com

*Attorneys for Irving H. Picard, Trustee for the  
Substantively Consolidated SIPA Liquidation  
of Bernard L. Madoff Investment Securities  
LLC and the Estate of Bernard L. Madoff*

**ARNOLD & PORTER LLP**

By: /s/ Andrew T. Karron  
555 Twelfth Street, NW  
Washington, DC 20004  
Telephone: (202) 942-5000  
Facsimile: (202) 942-5999  
Scott B. Schreiber  
Email: Scott.Schreiber@aporter.com  
Andrew T. Karron  
Email: Andrew.Karron@aporter.com

*Attorneys for Platinum All Weather Fund  
Limited*